Before the Federal Communications Commission Washington D.C. 20554

In the Matter of)
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)) CG Docket No. 03-123))

REPLY COMMENTS OF

ALEXANDER GRAHAM BELL ASSOCIATION FOR THE DEAF ON ASSIGNING INTERNET PROTOCOL-BASED TELECOMMUNICATIONS RELAY SERVICE USERS TEN-DIGIT TELEPHONE NUMBERS LINKED TO THE NORTH AMERICAN NUMBERING PLAN

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April 18, 2008

The Alexander Graham Bell Association for the Deaf and Hard of Hearing (AG Bell), established in 1890, is the only national organization dedicated to supporting children and adults who are deaf or hard of hearing who use spoken language and hearing technology to communicate in mainstream society. With state chapters throughout the U.S., AG Bell represents children and adults with hearing loss and the families and professionals who support them. Through advocacy, education, research and financial aid, AG Bell helps to ensure that every child and adult with hearing loss has the opportunity to listen, talk and thrive in mainstream society.

AG Bell fully supports the proposal of establishing a single, open, and global database of registered ten-digit numbers for videophone (VP) users with or without hearing loss that would be available to all service providers, thereby enabling VP users and non-VP users to call any VRS user whether directly (VP to VP) or via any chosen VRS (video relay service) provider.

Furthermore, AG Bell wishes to ensure that ten-digit VP numbering service be fully available to all persons regardless of hearing loss, as many deaf and hard of hearing VRS consumers have family members, friends, co-workers, and other associates who are hearing and who may wish to use VP service to call or be called by other VP users.

AG Bell joins other commenters in calling for a neutral third-party issuer of ten-digit numbers for VPs, so that consumers can choose to obtain their numbers from this third party or from a VRS provider.

AG Bell understands that many VRS providers offer subsidized videophone (VPs) to consumers, and AG Bell does not expect providers to feel obligated to provide such VPs to hearing consumers. However, to ensure functional equivalency, all telephone users regardless of hearing or communication modality should have full access to VRS services.

Finally, AG Bell wishes to remind the Commission that a growing percentage of VRS users are deaf and hard of hearing individuals who do not use sign language exclusively, but rather incorporate speech reading, hearing, and sign in varying degrees. Therefore, AG Bell urges the Commission to ensure that VP access and all VRS services are fully accessible to consumers who wish access to Communication Assistants via speech reading and either English or Spanish word order.

Respectfully submitted by,

Alexander Graham. Executive Director

Alexander Graham Bell Association for the Deaf and Hard of Hearing